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McIntosh, NM 87032
January 21, 2000

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Ms. Magalie Roman Salas, Secretary
Federal Communications Commission
445 12 Street SW
Washington, D.C. 20554

FCC MAIL ROOM

RE: PETITION FOR RECONSIDERATION, WT Docket 98-143
regarding FCC Report and Order 99-412, Restructuring of the Amateur Radio Service
licensing

Dear Ms. Salas:

Enclosed are the required seven copies for comment on the specific Petition for Reconsideration.

I attempted to use the on-line filing system, but was advised the docket was not available for comment.

Thank you.

Sincerely,



Emmett E. Brooks
PO Box 57
McIntosh, NM 87032
Phone: 505-384-2707
Fax: 505-384-1145
Email: Ed.brooks@excite.com

Amateur Radio License, W5HTW

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RE: WT Docket 98-143
FCC 99-412

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COMMENT. RE: THE REPORT AND ORDER FOR RESTRUCTURING OF THE AMATEUR RADIO SERVICE LICENSING PROCEDURE, AND THE PETITION FOR RECONSIDERATION, ITEMS LISTED ABOVE.

In Response to the above Petition for Reconsideration for Restructuring, I'd like to submit the following comments.

I. THE NOVICE CLASS LICENSE.

The original Novice Class of amateur radio license, issued for one-year, or for two years, non-renewable, served the purpose of supply an entry level license into the hobby of amateur radio. Many people enter an endeavor with the idea of "trying it out" and this license provided that opportunity. Those who found the hobby of further interest had ample opportunity to study, and to upgrade their status in the hobby.

Making this license continuously renewable defeated its singular purpose of serving as an entry and test license. This was the beginning of the changes that were to defeat the purpose of the hobby of amateur radio.

This license should be retained as an entry level "learner's permit." It should not be renewable, and should be good for a term of two years. Keeping this license under the Report and Order, but not allowing new Novice applications, suggests that, as the Novice use of these subbands decreases, they will automatically be reallocated, simply by attrition. This was not indicative of the FCC looking far enough ahead, unless with the idea the bands would be refarmed during the next restructuring.

II. THE TECHNICIAN/TECHNICIAN PLUS CLASS LICENSES

The Technician Class of license, as originally defined, was considered the "Experimenter's license." This license was to encourage the experimentation by amateur radio operators in the VHF/UHF and microwave regions.

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The advent of the no-code requirements for the standard Technician Class of license, versus the Technician Plus class, was the first major step in the division of amateur radio since its inception. The hobby almost instantly was divided between the High Frequency "ham" and the "VHF" ham, and there was a substantial degree of antagonism between the two. In many cases, the VHF ham was referred to as a CB-ham, or a non-ham.

Aside from the political aspects of this no-code license, the result was to thrust upon the amateur radio bands a new breed of amateur who found himself able to get into a hobby, but unable to advance in it. Much like the Technician of the fifties and sixties, this "no-code Tech" found himself stuck on VHF, with little hopes of progressing to General Class.

The lumping together of the Technician and Technician Plus forms an enforcement nightmare, and could better be handled by simply automatically upgrading all Technicians to Technician Plus license holders. Realizing granting HF privileges without meeting the international Morse code requirements would be difficult, if not impossible, this step should not have been taken at all. The license separation between Technician and Technician Plus should have been maintained. Neither the FCC nor the amateur radio operators can take the time to enforce this useless separation.

It is therefore unenforceable. Consequently, it is de facto granting of HF privileges to Technician Class license holders, who do not meet international requirements for Morse code.

III. THE GENERAL CLASS LICENSE

The General Class license is the "Standard." It is equivalent to a "Journeyman's License" in the trades. As such, it should require specific skills and abilities. These requirements can be met under the current Report And Order For Restructuring, FCC-99-412. A Morse Code proficiency of 5 Word Per Minute is satisfactory.

IV. THE ADVANCED CLASS LICENSE

If there were grounds for any kind of automatic upgrading, this would be it. However, I am thankful it did not occur. It is assumed all currently licensed Advanced Class licensees have passed a 13 WPM Morse code requirement. Having done so, as thousands of amateurs before them have proved, it is a short step to 20 WPM for the Amateur Extra Class.

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This license is satisfactory with the Restructuring, but, if recommendations for the Extra Class are taken into consideration, the reduced code requirement of 5 WPM creates a significant leap to the next step.

V. THE AMATEUR EXTRA CLASS LICENSE

This is the one license which should not have been changed at all. Unlike the Journeyman level of the General, this is the Expert level. A critical mistake was made when the two-year experience requirement was removed from this license, as it started the trend of producing "instant experts."

This has now become the desired "entry level" license. While not many can actually do that, some do, and potentially, all could, by simply studying diligently before taking any amateur examination. This means a non-ham can walk into a test session, and leave that session with an Amateur Extra Class license. Hence experience has been invalidated.

Likewise there was no logical reason for reducing the code speed requirement for a prestige, "expert class" license. It should have been kept at 20 words per minute, not 13, and certainly not 5 words per minute.

Requirements for easy entry were already in place. The Novice, the Technician, and even the General, are easily attainable. With the deletion of the Novice, there now are three start-up licenses, and those who are on the air with Extra Class licenses can now lay claim to the new American process of started at the top, not by learning how to get there, but by having the top brought down to their level.

The bottom line is/was, this is/was the Expert Class. Now there are no experts, and this license carries no special significance. With the modified requirements, many amateur radio operators see in the extremely near future a one-class amateur radio service (it is already very close to that, with the Restructuring) and a second step to follow will be a NO-class license.

There is little doubt that the vast majority of the new Technician Plus, Generals, and Extras, will simply resort to HF voice operation. The alleged intended desire to increase technology by eliminating the need to learn an outdated technology (Morse) will accomplish nothing at all, for another means of outdated technology (voice) will be the operations mode of choice. No one anywhere believes the "new ham" will resort, in any majority, to digital equipment and modes of operation.

Comment Re: Petition WT Docket 98-143
Petition for Reconsideration, FCC Report and Order 99-412
E. E. Brooks, McIntosh, NM January 20, 2000

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SUMMARY

The Novice license should be not only reinstated as an entry level, but returned to a non-renewable status, that of "learner's permit."

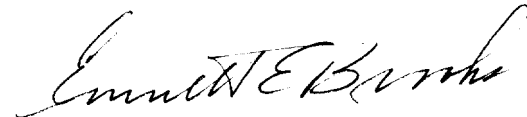
The Technician and Technician Plus licenses should remain separate, to offer some enforcement capability.

The General and Advanced Class of licenses should be as defined in the Report and Order for Restructuring.

The Extra Class license should be left with a truly expert level of theory, a 20 word per minute Morse test, and should be returned to the two-year experience requirement. It should stand for something in experience and skills.

Thank your for reviewing these comments, filed toward the specified documents.

Sincerely,



Emmett E. Brooks,
Amateur Radio Licensee, W5HTW
PO Box 293
McIntosh, NM 87032
Phone 505-384-2707
Fax 505-384-1145
Email: Ed.brooks@excite.com